



Entered on Docket  
March 11, 2008

A handwritten signature in cursive script, reading "Bruce A. Markell".

Hon. Bruce A. Markell  
United States Bankruptcy Judge

Stephanie L. Cooper, Esquire  
Nevada Bar No. 5919  
THE COOPER CASTLE LAW FIRM  
f/k/a THE COOPER CHRISTENSEN LAW FIRM, LLP  
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Loan No. 680412-00-161151 / Our File No. 08-01-0243

Attorney for Secured Creditor  
Household Finance Realty Corporation of Nevada

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

KATHLEEN R. STRADER

Debtor(s)

CHAPTER 13  
BANKRUPTCY NO.: 07-14923-BAM  
DATE: 02/13/2008  
TIME: 1:30 P.M.  
MOTION NO.:

**STIPULATED ORDER FOR ADEQUATE PROTECTION AND TERMINATION OF  
AUTOMATIC STAY UPON NON-PAYMENT**

THIS MATTER HAVING been settled and both parties agreeing, Michael W. Chen,  
Esq. of THE COOPER CASTLE LAW FIRM attorneys of record for Secured Creditor, and  
KATHLEEN R. STRADER represented by Sam Benevento, and this Court being fully advised  
on the premises, and good cause appearing;

IT IS ORDERED, ADJUDGED AND DECREED that the total post-petition arrears are  
as follows:

3 monthly payments at \$2,150.61 \$6,451.83  
November 2007 through January 2008

Total Post-Petition Arrearage \$6,451.83

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that on or before February 13, 2008, the DEBTOR shall pay directly to Secured Creditor the sum of \$2,150.61. Based on that payment, Secured Creditor will bring the loan post-petition current through February 2008 by deferring the remaining post-petition arrears, the February 2008 regular monthly payment and attorneys' fees incurred with this Motion to the end of the loan.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that DEBTOR(S) shall maintain regular monthly post-petition payments on Secured Creditor's 1st Trust Deed obligation, encumbering the subject Property, generally described as 214 Pocahontas Ct., Henderson, NV 89014 ("Property" herein) and legally described as follows:

**EXHIBIT A (PAGE 1)**

**LOT SIXTY-SIX (66) IN BLOCK TWO (2) OF TRAILSIDE POINT-UNIT 4, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 42, OF PLATS, PAGE 20, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA.**

in a timely fashion, commencing with the March 2008 regular monthly payment, and continuing thereafter on the 1<sup>st</sup> day of each month. Payments are due on the 1<sup>st</sup> day of each month. Said payments shall be made to Secured Creditor at any of its local branch offices.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Debtor shall pay into the plan on time and must remain current as previously directed by the Trustee.

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all actions taken by  
2 the Secured Creditor's in regards to the statutory remedies afforded under State Foreclosure  
3 Statutes are in full force and effect until Secured Creditor's Proof of Claim is paid in full.

4 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that in the event that the  
5 Debtors fail to comply with any of the payments ordered above, Secured Creditor shall send a  
6 written notice of default to KATHLEEN R. STRADER at 214 Pocahontas Ct, Henderson, NV  
7 89014 with a copy sent to the Debtor's counsel Sam Benevento, located at 1945 E Warm  
8 Springs Rd, Las Vegas, Nv 89119, stating that the Debtor shall have ten (10) days to cure. An  
9 additional attorney's fee of \$100.00 will be incurred for each notice of default. In the event that  
10 the Debtors fail to timely cure said default of payments after the ten (10) day period has expired,  
11 Secured Creditor shall submit an Ex Parte Order Terminating the Automatic Stay. Upon entry of  
12 the Ex Parte Order, the Automatic Stay shall be immediately extinguished for all purposes as to  
13 Secured Creditor, Household Finance Realty Corporation of Nevada, its assignees and/or  
14 successors in interest, and Secured Creditor may proceed with a foreclosure of and hold a  
15 Trustee's Sale on the subject property, pursuant to applicable state law, and commence any action  
16 necessary to obtain complete possession of the subject Property. Upon disposition of the  
17 collateral, Secured Creditor will amend or delete its Proof of Claim and provide Trustee with the  
18 notice of same.

18 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that in the event this case  
19 converts to a Chapter 7 proceeding the Secured Creditor will issue the same written notice as  
20 stated above for the total arrears to include pre-petition debt (if any should remain) that would  
21 have been paid through the former Chapter 13 Plan which Debtor will be given the same ten (10)  
22 day period to cure. In the event Debtor fails to cure said arrears after the ten (10) day period has  
23 expired, Secured Creditor shall submit an Ex Parte Order Terminating the Automatic Stay. Upon  
24 entry of the Ex Parte Order, the Automatic Stay shall be immediately extinguished for all  
25 purposes as to the Secured Creditor, Household Finance Realty Corporation of Nevada, its

1 assignees and/or successors in interest, and Secured Creditor may proceed with a foreclosure of  
2 and hold a Trustee's Sale on the subject property, pursuant to applicable state law, and  
3 commence any action necessary to obtain complete possession of the subject Property.

4 Submitted by:

5 THE COOPER CASTLE LAW FIRM

6 By:

Date:

7 Stephanie L. Cooper, Esq.  
8 Attorney for Secured Creditor  
Household Finance Realty Corporation of Nevada

9 ~~APPROVED/DISAPPROVED~~

10 By:

Date:

2-13-08

11 Sam Benevento

12 Attorney for KATHLEEN R. STRADER

13 ~~APPROVED/DISAPPROVED~~

14 By:

Date:

2-29-08

15 Rick A. Yarnall  
16 Standing Trustee

1 ALTERNATIVE METHOD re: RULE 9021:

2 In accordance with Local Rule 9021, the undersigned certifies:

3 \_\_\_\_\_ The court has waived the requirement of approval under LR 9021.

4  
5 \_\_\_\_\_ No parties appeared or filed written objections, and there is no trustee appointed  
6 in the case.

7 X I have delivered a copy of this proposed order to all counsel who appeared at the  
8 hearing, any unrepresented parties who appeared at the hearing, and any trustee appointed in this  
case, and each has approved or disapproved the order, or failed to respond as indicated below:

9 Sam Benevento - approved

10 Rick Yarnall – approved

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